

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Performance Measurements and Standards for)	
Unbundled Network Elements and)	CC Docket No. 01-318
Interconnection)	
)	
Performance Measurements and Reporting)	
Requirements for Operations Support)	CC Docket No. 98-56
Systems, Interconnection, and Operator)	
Services and Directory Assistance)	
)	
Deployment of Wireline Services Offering)	CC Docket No. 98-147
Advanced Telecommunications Capability)	
)	
Petition of Association for Local)	CC Docket Nos. 98-147, 96-98, 98-141
Telecommunications Services for Declaratory)	
Ruling)	

COMMENTS

BellSouth Corporation, on behalf of itself and its wholly owned subsidiaries (“BellSouth”), hereby submits the following comments in support of the Motion For Extension Of Time filed by the United States Telecom Association (“USTA”).

Under the current schedule, comments in the above referenced rulemaking are due December 31, 2001, with reply comments to be filed by January 22, 2002. In its motion, USTA requests that the Commission extend the comment and reply comment periods by thirty days. As USTA points out, the current comment schedule falls within Christmas and New Year holiday period. It is a time period when personnel necessary to addressing the issues raised in the rulemaking are often unavailable.

The brief extension requested by USTA will afford interested parties an adequate time to consider and prepare comments that are responsive to the notice of proposed rulemaking. Affording commenters the additional time to prepare their comments will facilitate the development of a more complete record that in turn will enable the Commission to conclude this proceeding in a reasonable and timely manner.

Accordingly, the Commission should grant USTA's motion.

Respectfully submitted,

BELLSOUTH CORPORATION

By: /s/ Richard M. Sbaratta
Richard M. Sbaratta
J. Phillip Carver

Its Attorneys

Suite 4300
675 West Peachtree Street, N. E.
Atlanta, Georgia 30375-0001
(404) 335-0738

Date: December 4, 2001

CERTIFICATE OF SERVICE

I do hereby certify that I have this 4th day of December 2001 served the following parties to this action with a copy of the foregoing **COMMENTS** by electronic filing and/or by placing a copy of the same in the United States Mail, addressed to the parties listed below.

+Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room TW-A325
Washington, D. C. 20554

Michelle Carey
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 5-C450
Washington, D. C. 20554

+Qualex International
The Portals, 445 Twelfth Street, S. W.
Room CY-B42
Washington, D. C. 20554

Cathy Carpino
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 5-C450
Washington, D. C. 20554

Keith Townsend
Director, Legal and Regulatory
Affairs and Senior Counsel
USTA
1401 H Street, NW
Suite 600
Washington, D. C. 2005-2164

Dorothy Attwood
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 5-C450
Washington, D. C. 20554

/s/ Juanita H. Lee
Juanita H. Lee

+ **VIA HAND DELIVERY**